

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

Civil Action No. 03-12355-RCL

THOMAS BUFFONGE)
Plaintiff)
)
Vs.)
)
PRUDENTIAL INSURANCE)
COMPANY)
And)
GETRONICS WANG CO., LLC)
Defendants)
)

PLAINTIFF'S MOTION FOR 30 DAY EXTENSION OF TIME TO COMPLETE
SERVICE OF PROCESS

Plaintiff Thomas Buffonge, through counsel, hereby respectfully requests that he be allowed an extension of time of 30 days to complete service on Defendants in this action, up to and including April 19, 2004. As grounds for this motion, Plaintiff states as follows:

1. This is an action for failure to pay benefits in accordance with a disability insurance plan which was filed on November 21, 2003. Accordingly, returns of service of process are scheduled to be filed no later than March 20, 2004.
2. On November 22, 2003 counsel for Plaintiff was unexpectedly hospitalized on an emergency basis, and several days later underwent coronary artery bypass surgery. Although the surgery was successful, Counsel for Plaintiff did not return to work on even a part time basis until mid-January 2004, and only recently (in February 2004) returned to work on a full time basis.
3. Plaintiff has not yet been able to complete service of process upon Defendants, but anticipates being able to do so shortly.

For all of the foregoing reasons, it is respectfully requested that this motion be allowed, and Plaintiff be allowed an extension of time of 30 days in which to complete service of process, up to and including April 19, 2004.

Respectfully submitted,

Thomas Buffonge
By his attorney

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